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Frank S. Simone
Government Affairs Director



JAN 31 2000

FEDERAL COMMUNICATIONS COMMISSION
OFFICE OF THE SECRETARY

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EX PARTE OR LATE FILED
January 31, 2000

Ms. Magalie Roman Salas
Secretary
Federal Communications Commission
445 Twelfth Street, S. W. – Room TWB-204
Washington, D. C. 20554

Re: Ex parte, CC Docket No. 00-4, Application by SBC Communications Inc.,
Southwestern Bell Telephone Company, and Southwestern Bell Communications
Services, Inc. d/b/a Southwestern Bell Long Distance for Provision of In-Region
InterLATA Services in Texas

Dear Ms. Salas:

On Friday, January 28, 2000, I met with the following representatives of the Commission's Common Carrier Bureau: Jake Jennings, Audrey Wright and Jessica Rosenworcel. The purpose of the meeting, consistent with the Commission's January 10, 2000 Public Notice (DA 00-37), was to provide an overview of the comments that AT&T would be filing in this proceeding on Monday, January 31, 2000.

AT&T indicated its comments would address (1) the Southwestern Bell Telephone Company ("SWBT") practice of requiring end user customers who subscribe to SWBT DSL service to also subscribe to SWBT voice service; (2) the application by SWBT of unwarranted nonrecurring charges when provisioning the unbundled network element platform to competitive local exchange carriers; (3) provisions in SWBT's interconnection agreement with AT&T that allow SWBT to withhold access to UNEs unless and until AT&T obtains the written consent of all SWBT vendors who own or control intellectual property embedded in the UNEs; (4) SWBT's interconnection policies that require AT&T to establish a minimum of one point of interconnection in each local exchange area in which AT&T intends to offer local service; (5) SWBT's poor UNE loop "hot cut" performance and its impact on AT&T's business; (6) access to SWBT's operations support systems and AT&T's experiences with them to date in Texas; and (7) performance measurement results that indicate CLECs are receiving discriminatory service from SWBT as they try to enter the local services market in Texas. I also provided to the staff a list of planned affidavits to reveal other topics to be addressed in AT&T comments that, due to the

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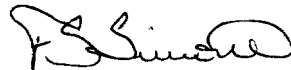
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amount of time allotted to AT&T for the meeting, we were not able to cover with the Commission staff.

In addition, at the request of the staff AT&T provided Mr. Jennings, Ms. Wright and Ms. Rosenworcel a copy of the Joint Affidavit of Mark Van de Water and Robert J. Royer (Redacted version), filed with the Texas Public Utility Commission, Project No. 16251, on December 16, 1999.

Two copies of this Notice are being submitted to the Secretary of the FCC in accordance with Section 1.1206 (b) of the Commission's rules.

Sincerely,

A handwritten signature in black ink, appearing to read "F. S. Smith". The signature is fluid and cursive, with the first name "F." and last name "Smith" clearly distinguishable.

ATTACHMENT

cc: J. Jennings
J. Rosenworcel
A. Wright

Affidavits

DSL – Mike Pfau and Julie Chambers

UNE Loops – Sarah DeYoung

OSS – Nancy Dalton and Sarah DeYoung

Telcordia Testing – Nancy Dalton and Tim Connolly

Interconnection – Sarah DeYoung and Pam Brander

Nondiscriminatory Access to UNEs (Intellectual Property) – Dan Rhinehart and Mark Witcher

Performance Measurements/Backsliding – Mike Pfau and Sarah DeYoung

Performance Measurements – Colin Mallows

Pricing (Glue Charges) – Dan Rhinehart

Scope and Nature of Local Competition – Daniel Kelly and Steve Turner

AT&T Business Plans for Residential Entry in Texas – Phil Tonge and Ed Rutan

AT&T Business Plans for Business Entry in Texas – Cliff Holtz

272 – Bob Kargoll

Price Squeeze – Janusz Ordovery and Robert Willig

SWB AND AT&T

December 16, 1999

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TELECOMMUNICATIONS MARKET §

**JOINT AFFIDAVIT OF
MARK VAN DE WATER AND ROBERT J. ROYER**

*Redacted Version*Page(s)

Joint Affidavit2

Addenda:

Attachment 1: Summary of the Jointly Reconciled Results (Redacted).....7
Attachment 2: CHC Outage Root Cause Analysis8

Original + 22

cc: Katherine D. Farroba, ALJ, PUC (hand delivered)
Donna Nelson, General Counsel, PUC (hand delivered)
Howard Siegel, OPD, PUC (hand delivered)
Nara Srinivasa, TIA, PUC (hand delivered)
Rick Guzman, OPUC (hand delivered)
All Parties of Record (hand delivered or via facsimile)

PROJECT NO. 16251

INVESTIGATION OF SOUTHWESTERN § PUBLIC UTILITY COMMISSION
BELL TELEPHONE COMPANY'S §
ENTRY INTO THE TEXAS INTERLATA § OF TEXAS
TELECOMMUNICATIONS MARKET §

JOINT AFFIDAVIT OF
MARK VAN DE WATER AND ROBERT J. ROYER

Robert J. Royer and Mark Van de Water being first duly sworn, depose and state as follows:

My name is Robert J. Royer. I am employed as an Account Manager on the AT&T Account Team. In that position I am responsible for Ancillary Services and Maintenance/Repair.

My name is Mark Van de Water. I am employed with AT&T as Manager—Business Products, OSS and Negotiations. In that position, I have responsibility for negotiating and implementing OSS requirements and interfaces and resolving operational issues for AT&T Local Services.

PROVISIONING PROCESS IMPROVEMENT GROUP (PPIG)
FOR UNE-L SERVICES

On September 2, 1999, AT&T filed a pleading in Docket 16251 entitled "Issues Relating to Commercial Activity" raising issues and difficulties AT&T was encountering during its commercial entry in Texas. At the September 9, 1999 Open Meeting, the Texas Commission transferred the filing to Docket 21000. On September 21, 1999, AT&T and SWBT met, with the assistance of the Texas Staff, to discuss the operational issues raised by AT&T's filing. As a result of that meeting and a subsequent meeting on October 1, 1999, the Provisioning Process Improvement Group (PPIG) was formed. The PPIG was constituted as a working group of

SWBT and AT&T representatives that would meet on an ongoing, regular basis to address operational issues as they arose. Separate PPIGs were formed to focus on issues that arose during AT&T's UNE-L and UNE-P entry.

The initial charge for the PPIG for UNE-L was to investigate and reconcile data related to service outages that occurred during the provisioning process for UNE-L and UNE-L with LNP for AT&T Local Services (TCG). These outages are currently not captured in a performance measurement.

During the November 2, 1999, Public Interest Hearing, the Commission requested that SWBT retrieve its log notes from archives and provide outage information to AT&T for UNE-L with LNP Coordinated Hot Cuts for August 1999. This data, once retrieved and sent to AT&T, was to be jointly reviewed and reconciled in the weekly AT&T and SWBT Provisioning Process Improvement Group (PPIG) conference calls.

The requested archived data was forwarded to AT&T, initially for August. In response, AT&T provided its own list of orders that experienced outages during August to SWBT. Many of the August outages identified by AT&T were not included in SWBT's original list of outages.

RECONCILIATION PROCESS

The reconciliation process has taken place during weekly conference calls of the UNE-L PPIG group from late September, 1999 to the present. The process involved reviewing AT&T and SWBT data and operations centers log notes for coordinated cutovers that were identified by each company as experiencing an unexpected outage during the provisioning process. Based on a joint assessment of the data and logs, these misses were attributed to either AT&T, SWBT or to a category labeled "Unreconciled or End User Caused". In those cases where the AT&T and SWBT records were unclear or did not agree as to where the defect properly belonged, the

results were categorized as "Unreconciled." A summary of the jointly reconciled results is provided as Attachment 1.

During the reconciliation process, the companies also jointly engaged in a root cause analysis of the unexpected outages. Based on a joint assessment of the data, the service outages were classified into 15 different categories, some of which were further divided into subcategories, for a total of 27 categories or subcategories. These 15 different root causes are displayed on the CHC Outage Root Cause Analysis, which is attached as Attachment 2.

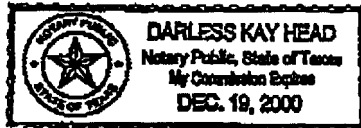
The reconciliation process also included a review of both companies' internal methods and procedures for coordinated cutovers. This review proved to be beneficial to both companies, and the companies are working to document a process improvement action item list, which will be cooperatively implemented by our companies. These process improvement action items will be in addition to the process improvement action items identified as a result of the reconciliation of Performance Measures 114, 115 and 58 and discussed in the Joint Affidavit of Sarah deYoung and Rhonda Huser. Additionally, the companies have agreed to discuss outage duration definitional issues in order to arrive at common standards for how outages should be measured. A definite date for those discussions has not yet been scheduled.

Further affiants sayeth not.

STATE OF TEXAS §

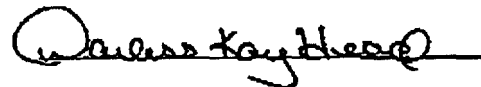
COUNTY OF TRAVIS §

I, Robert J. Royer, of lawful age, being duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of Southwestern Bell Telephone Company, that I have read the foregoing statement and the information contained in the foregoing is true and correct to the best of my knowledge and belief.




Robert J. Royer
Southwestern Bell Telephone Company
Account Manager-Industry Markets

SUBSCRIBED AND SWORN TO BEFORE ME this 16 day of December 1999.



My commission expires:

December 19, 2000

VERIFICATION

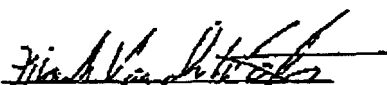
STATE OF TEXAS

§
§
§
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COUNTY OF TRAVIS

I, Mark Van de Water, of lawful age, being first duly sworn, now state: that I am authorized to provide the foregoing statement on behalf of AT&T; that I have read the foregoing statement and the information contained in the foregoing is true and correct to the best of my knowledge and belief.




Mark Van de Water
Manager-Business Products
AT&T Network Services

SUBSCRIBED AND SWORN TO BEFORE ME this 16th day of
December, 1999.


Notary Public

My commission expires:

3/22/2000

11/22/1999 FINAL

ATTACHMENT 1

LOCAL PERFORMANCE - Coordinated Hot Cut Outages*
SOUTHWESTERN BELL
AUGUST, 1999

Measure Not Defined	Percent Orders which experienced unexpected outage during the provisioning process	AT&T/TCG Caused	SWBT Caused	Unreconciled or End User Caused	Total
	TCG LNP w/loop (## orders/## lines)	1.0 % orders (##) 1.2 % lines (##)	5.1 % orders (##)*,*** 4.4 % lines (##)	3.4 % orders (##) 1.8 % lines (##)	9.5 % orders (##)* 7.4 % lines (##)

LOCAL PERFORMANCE - Coordinated Hot Cut Outages
SOUTHWESTERN BELL
SEPTEMBER, 1999

Measure Not Defined	Percent Orders which experienced unexpected outage during the provisioning process	AT&T/TCG Caused	SWBT Caused	Unreconciled or End User Caused	Total
	TCG LNP w/loop (## orders/## lines)	2.5 % orders (##) 2.7 % lines (##)	11.4 % orders (##)** 7.1 % lines (##)	4.7 % orders (##)*** 2.1 % lines (##)	18.6 % orders (##) 11.9 % lines (##)

LOCAL PERFORMANCE - Coordinated Hot Cut Outages
SOUTHWESTERN BELL
OCTOBER, 1999

Measure Not Defined	Percent Orders which experienced unexpected outage during the provisioning process	AT&T/TCG Caused	SWBT Caused	Unreconciled or End User Caused	Total
	TCG LNP w/loop (## orders/## lines)	4.7 % orders (##) 2.8 % lines (##)	9.3 % orders (##) 6.6 % lines (##)	7.6 % orders (##)*** 3.5 % lines (##)	21.5 % orders (##) 12.9 % lines (##)

* Excludes 9 Loop with LNP orders in August that experienced outage during AT&T's trial of the PDT (Frame Due Time) process

** Includes 1 order in August, and 4 orders in September that experienced problems due to pre-existing retail end user troubles

*** Includes 2 orders in September, 1 in October that experienced problems due to customer inside wiring and/or CPB

REDACTED

ALS/SWBT
CHC
Outage Root Cause Analysis

ATTACHMENT2

Ref #	Trouble Found	August Ord/Lines	1999 # Lines OOS	Sept Ord/Lines	1999 # Lines OOS	Oct Ord/Lines	1999 # Lines OOS
1	Customer Access						
2	Customer Premise Out Out of Window			2/11	2	1/2	1
3	Cause: ALS						
4	Cause: SWBT Equipment	2/8	8	3/20	4	1/2	2
5	Cause: ALS					2/4	3
6	Cause: SWBT	4/25	6	2/4	2		
7	Other Cause: ALS						
8	Cause: SWBT						
9	Cause: Unknown			1/2	1		
10	Switch						
11	Unassignable Wiring	1/1	1				
12	Wrong Assignment	2/8	5				
13	Wrong pair	2/21	3	3/7	4	2/9	2
14	Not wired correctly	3/9	4	7/24	15	4/23	11
15	Wired but Not Cut			1/4	1		
16	Broken wire	1/4	4	1/4	1		
17	Missing x-connect					1/2	2
18	Service Order Errors Cause: ALS	1/5	4			1/4	3
19	Cause: LSC			6/16	16	1/1	1
20	Translations Cause: ALS	2/8	5	6/25	19	2/9	2
21	Cause: SWBT					1/3	1
22	Short Interval Expedited Orders						
23	Late Receipt						
24	Previous E.U. Trouble	1/4	1	4/7	5		
25	# on SWBT Troubles Log without matching AT&T record	1/3	1	3/13	4		
26	# on AT&T Troubles Log without matching SWBT record	6/25	8	3/7	5	6/18	8
27	# of joint records with trouble found, description mis-matches	2/3	3	2/13	5	1/1	1
	Total # of records	5328	1224	5328	1224	5328	1224
	Other Stats						
	# of Troubles on SWBT Log	14		25		13	
	Additional # of Troubles on AT&T Log	14		19		10	
	Total # of records	5328	1224	5328	1224	5328	1224
	Total # of Orders & Lines	5328	1224	5328	1224	5328	1224